

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

**DECLARATION OF KEVIN GANNON IN SUPPORT OF  
PLAINTIFF'S MOTION TO MODIFY THE SCHEDULING ORDER**

I, Kevin Gannon, hereby declare as follows:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for the plaintiff in this action, Singular Computing LLC ("Singular"). I submit this declaration in support of Singular's Motion to Modify the Scheduling Order.
2. Attached as Exhibit A is a true and correct copy of Plaintiff's Notice of Deposition of Johnny Chen.
3. Attached as Exhibit B is a true and correct copy of Defendant Google LLC's Objections to Plaintiff's Notice of Deposition of Johnny Chen.
4. Attached as Exhibit C is a true and correct copy of an email dated June 23, 2021.
5. Attached as Exhibit D is a true and correct copy of all status requests for attempts to serve Mr. Johnny Chen.
6. Attached as Exhibit E is a true and correct copy of the Declaration of Richard Goodin.
7. Attached as Exhibit F is a true and correct copy of an email dated July 22, 2021.
8. Attached as Exhibit G is a true and correct copy of Plaintiff's Notice of Subpoena to Testify at a Deposition of Richard M. Goodin.

Executed under the pains and penalties of perjury of the United States at Boston,  
Massachusetts on July 23, 2021.

/s/ Kevin Gannon

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